Reading file

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**REGION IX**
**75 Hawthorne Street**
**San Francisco, CA 94105-3901**

February 2, 2009

Mr. Mike Jewell
U.S. Army Corps of Engineers
Sacramento District
1325 J. Street, Room 1480
Sacramento, CA 95814

Subject: Notice of Intent to prepare an Environmental Impact Statement for the Preserve at Sunridge Project, City of Rancho Cordova, Sacramento County, California.

Dear Mr. Jewell:

The U.S. Environmental Protection Agency (EPA) has reviewed the Notice of Intent (NOI) to Prepare a Draft Environmental Impact Statement (DEIS) for the Preserve at Sunridge Project (Project) pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. These comments were also prepared under the authority of, and in accordance with, the provisions of the Federal Guidelines (Guidelines) promulgated at 40 CFR 230 under Section 404(b)(1) of the Clean Water Act (CWA).

The proposed Project would construct 2,703 residential units and up to 165,000 square feet of commercial space, a school, a neighborhood park, and stormwater management facilities on a 530-acre parcel in the City of Rancho Cordova. A 92-acre open space and wetland preserve area is proposed. Based on our review of the NOI, and a limited review of the October 2005, Draft Environmental Impact Report (DEIR) for the Project, we have several concerns with potential environmental impacts from the proposed Project.

**Waters of the U.S.**

EPA is particularly concerned with the potential impacts to waters of the U.S. (waters) that could occur at the Project site. According to the NOI, approximately 14.5 acres of waters would be lost due to direct impacts from fill, a loss of nearly 70 percent of the aquatic resources at the Project site. These impacts would be in addition to indirect and cumulative impacts. We are especially concerned with cumulative impacts to vernal pool complexes due to construction and operations of the proposed development. Several other projects are proposed in the Project area that would also diminish the already significantly reduced acreage of vernal pools in the Central Valley, and the threatened and endangered species they support.

EPA's November 18, 2005 comment letter on the U.S. Army Corps of Engineers' Public Notice, and our December 5, 2005 letter on the October 2005 DEIR for the Project, expressed our serious concerns with the apparent lack of compliance with the Clean Water Act Section 404(b)(1) Guidelines (Guidelines) that require the applicant (K. Hovnanian Homes) to demonstrate that the Proposed Action is the Least Environmentally Damaging Practicable Alternative (LEDPA). We stated objections due to the proposed significant impacts to Aquatic Resources of National Importance at the Project site and identified the Project as a candidate for elevation pursuant to the 1992 Memorandum of Agreement between the EPA and the Corps per CWA Section 404(q). Since then, EPA has been invited to be a cooperating agency, during the development of the DEIS, and we appreciate the opportunity to work with the Corps, and other federal and state agencies, as well as the City of Rancho Cordova, and K. Hovnanian Homes, to identify an alternative that is consistent with the Guidelines.

We recommend the DEIS be informed by studies that clearly and accurately identify and describe the aquatic resources at the Project site, including a functional assessment. The results of these studies should be summarized as part of the description of baseline site conditions; used to demonstrate potential Project impacts, as well as the need for impact avoidance, minimization, mitigation, and monitoring; and inform the selection of a preferred alternative. The DEIS should include a robust analysis of direct and indirect impacts of the Project, as well as cumulative impacts from past and reasonably foreseeable projects in the area that have or potentially will result in fill and degradation to waters.

For further assistance with issues pertaining to waters of the U.S., please continue to coordinate with Paul Jones, EPA Wetlands Office. Paul can be reached at (415) 972-3470, or by email at jones.paul@epa.gov.

**Groundwater**

Groundwater withdrawal is not discussed in the NOI, but, based on the DEIR, the proposed Project would include some groundwater withdrawal to meet water demands of the Project. EPA is concerned with potential impacts to groundwater characteristics due to overdraft, as well as substantial increases in impervious surfaces that could reduce infiltration rates and recharge of the local aquifer. The DEIR also mentions the proximity of the proposed Project down gradient from the state designated Inactive Rancho Cordova Test Site Superfund site, and the federal Aerojet General Corporation Superfund site. Groundwater at these sites has been contaminated with perchlorate and other carbon-based solvents. We are especially concerned with the potential for contamination of groundwater withdrawn for the Project due to the presence of these contaminates up gradient. To coordinate with EPA on Superfund site contamination information, please contact Kathleen Salyer, Chief, Site Cleanup Branch at (415) 972-3267, or by email at salyer.kathleen@epa.gov.

The DEIS should clearly describe existing groundwater conditions and any potential impacts to groundwater quantity or quality, and commit to avoidance measures to prevent impacts from the Project. EPA is concerned with impacts to groundwater quality and quantity in the Project area as well as the relationship between existing groundwater conditions and surface water resources that are influenced by these conditions. Any direct, indirect, or cumulative impacts to groundwater that may occur as a result of the Project should be clearly

assessed in the DEIS in light of these relationships. Mitigation measures should also be identified and committed to in the DEIS in order to assure that the Project will not have an adverse effect on groundwater and interrelated surface waters. Both design and conservation measures should be considered.

**Water Supply**

The DEIS should describe existing and/or proposed sources of water supply for the Project, anticipated water demand from the Project, and direct, indirect, and cumulative impacts to water resources that may occur. Because the proposed Project could result in significant increases in water demands for an indefinite period of time, EPA strongly encourages including a discussion in the DEIS of all water conservation measures that will be implemented to reduce water demands for the proposed Project. The Project design should maximize conservation measures such as appropriate use of recycled water for landscaping and industry, xeric landscaping, a water pricing structure that accurately reflects the economic and environmental costs of water use, and water conservation education. An estimate of the water resource benefits that result from each mitigation and conservation measure proposed should be included in the DEIS. Water saving strategies can be found in the EPA's publications *Protecting Water Resources with Smart Growth* at www.epa.gov/piedpage/pdf/waterresources_with_sg.pdf, and *USEPA Water Conservation Guidelines* at www.epa.gov/watersense/docs/app_a508.pdf.

In addition, the DEIS should describe water reliability for the Project and clarify how existing and/or proposed sources will be affected by climate change. At a minimum, EPA expects a qualitative discussion of impacts to water supply and adaptability of the Project to these changes, as part of the DEIS impacts analysis.

**Biological Resources**

EPA is very concerned with the level of significant impact from the proposed Project to biological resources. The Project lies within the California Floristic Province, designated by Conservation International as a biodiversity hotspot; and, as described in the Project's DEIR, potentially supports habitat for state and federal special status species, including vernal pool fairy shrimp, vernal pool tadpole shrimp, northwestern pond turtle, California tiger salamander, California red-legged frog, giant garter snake, western spadefoot toad, Swainson's hawk, Cooper's Hawk, white tailed kite, burrowing owl, loggerhead shrike, tri-colored blackbird, valley elderberry longhorn beetle, Sacramento orcutt grass, and slender orcutt grass. The DEIS should provide a description of baseline biological conditions, including habitats and species, and a description of direct, indirect, and cumulative impacts to these habitats and species. The DEIS should provide information on species and habitats protected under the Federal Endangered Species Act and the California Endangered Species Act, and describe how impacts will be avoided, minimized, and mitigated.

We are also concerned with the potential for the proposed Project to result in fragmentation of aquatic and terrestrial species habitats, and encourage the Corps, City of Rancho Cordova, and K. Hovnanian Homes to identify alternatives that maintain large habitat conservation areas at the Project site. Numerous studies have demonstrated that edge effects and the size of contiguous habitat areas are critical to species health, diversity, and abundance. The

DEIS should consider the impacts of habitat fragmentation and edge effects for aquatic and terrestrial species and identify avoidance and mitigation measures to address them.

The Corps, City of Rancho Cordova, and K. Hovnanian Homes should ensure that the Project is consistent with the South Sacramento Habitat Conservation Plan (HCP). The proposed Project is located within the geographic scope of the HCP, which is currently undergoing the environmental review process under the direction of the U.S. Fish and Wildlife Service (Service) and Sacramento County. We acknowledge that the City of Rancho Cordova is a local sponsor and involved in the development of the HCP. The DEIS should summarize the conservation goals of the HCP and describe how the proposed Project would avoid conflict with these goals.

The DEIS should also describe coordination with the Service and California Department of Fish and Game (CDFG) to reduce and mitigate impacts to all listed species and their habitats at the Project site.

**Air Quality and Traffic**

The DEIS must adequately assess air quality impacts of the Project and minimize these impacts through adequate mitigation measures. The proposed Project area falls within the Sacramento Metropolitan Air Basin, which is designated nonattainment for national ambient air quality standards (NAAQS) including ozone and particulate matter less than 10 microns ($PM_{10}$). Specifically, the air basin is designated serious nonattainment for 8-hour ozone, and moderate nonattainment for $PM_{10}$. The DEIS should provide a discussion of the baseline air quality conditions in the Project area, a description of federal and state air quality regulations, and a rigorous assessment of direct, indirect, and cumulative effects of the proposed Project on air quality. The analysis of air quality impacts should include direct, indirect and cumulative impacts from construction and post construction conditions, including increased traffic. The DEIS should describe specific commitments to mitigate emissions that will prevent further degradation of air quality in the Air Basin. In short, the cumulative impacts analysis should consider all new sources of emissions that are likely to result from the proposed Project. An estimate of the air quality benefits that result from each mitigation measure proposed should be included in the DEIS. The DEIS should also describe coordination with EPA, California Air Resources Board, and the Sacramento Metropolitan Air Quality Management District to reduce air quality impacts in the Air Basin. For 8-hour ozone-related questions, the Corps is encouraged to contact Raymond Chavira, EPA Air Division, at (415) 947-4218 or by email at chavira.raymond@epa.gov. For $PM_{10}$, contact Eleanor Kaplan, EPA Air Division, at (415) 947-4147, or by email at kaplan.eleanor@epa.gov.

The DEIS should describe whether the Project will or will not meet general conformity requirements with the associated state implementation plans for the Air Basin. If the federal action is determined to potentially interfere with the attainment of Clean Air Act NAAQS, the Corps is required to conduct a conformity analysis to determine the likelihood and extent of interference. Though the Clean Air Act does not require a federal lead agency to prepare a draft General Conformity Determination as part of the NEPA process, the EPA recommends this in the interest of full public disclosure and to better inform decision making. For general conformity-related questions, the Corps is encouraged to contact John Kelly, EPA Air Division, at (415) 947-4151 or by email at kelly.johnj@epa.gov.

To prevent further degradation of air quality in Sacramento and San Joaquin Counties from construction-caused $PM_{10}$ and particulate matter less than 2.5 microns ($PM_{2.5}$), the EPA suggests several construction measures be adopted in the DEIS. Sacramento County is not designated nonattainment for $PM_{2.5}$; however, San Joaquin County, immediately to the south, is so designated.

*Fugitive Dust Source Controls:*

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

*Mobile and Stationary Source Controls:*

- Reduce use, trips, and unnecessary idling from heavy equipment.
- Maintain and tune engines per manufacturer's specifications to perform at the EPA certification levels and to perform at verified standards applicable to retrofit technologies. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.
- Prohibit any tampering with engines and require continuing adherence to manufacturers recommendations
- If practicable, lease newer and cleaner equipment meeting the most stringent of applicable Federal or State Standards.
- Utilize EPA-registered particulate traps and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site.

*Administrative controls:*

- Identify where implementation of mitigation measures is rejected based on economic infeasibility.
- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.)
- Utilize cleanest available fuel engines in construction equipment and identify opportunities for electrification. Use low sulfur fuel (diesel with 15 parts per million or less) in engines where alternative fuels such as biodiesel and natural gas are not possible.
- Develop a construction traffic and parking management plan that minimizes traffic interference and maintain traffic flow.

The DEIS should identify sensitive receptors in the Project area, such as schools, daycare centers, nursing homes, and hospitals, and specify the means by which impacts to these receptors will be minimized due to both construction and long term land use associated with the Project. For example, locate construction equipment and staging zones away from sensitive receptors, away from fresh air intakes and buildings, and design neighborhoods such that activity centers (ball fields, etc.) and sensitive receptors are not proximate to emissions sources, such as highways.

Due to the scale of the proposed Project and the numbers of new residents and jobs in the area, it is reasonable to anticipate increased traffic and congestion on the local surface streets, freeways, and highways. The DEIS should include a traffic analysis to determine how the proposed Project will affect traffic in the region and contribute to cumulative air quality impacts.

**Cumulative Effects**

The proposed Project would be one of several developments in the area that have occurred in the recent past or are proposed and under various stages of development. As a result, it is critical that the cumulative effects analysis be comprehensive and rigorous, and that it consider an appropriate scope of activities and spatial and temporal scales when assessing project effects. The EPA suggests referring to the Council on Environmental Quality 1997 guidance *Considering Cumulative Effects Under the National Environmental Policy Act,* found at http://www.nepa.gov/nepa/ccenepa/ccenepa.htm,, and 1999 EPA guidance, *Consideration of Cumulative Impacts in EPA Review of NEPA Documents,* found at http://www.epa.gov/compliance/resources/policies/nepa/cumulative.pdf. In addition, we recommend referring to the EPA, California Department of Transportation, and Federal Highway Administration Guidance for Preparers of Cumulative Impact Analysis, found at http://www.dot.ca.gov/ser/cumulative_guidance/purpose.htm. While this guidance was developed for transportation projects, the principles and the 8-step process in this guidance can be applied to other types of projects, both within and outside of California. We recommend the principles and steps in this guidance to other agencies as a systematic way to analyze cumulative impacts for their projects.

**Induced Growth**

The DEIS should describe how the proposed Project could result in environmental impacts due to induced-growth. Construction of a new development the size, and with the anticipated population, of the Project could result in increased pressure for more development, increased transportation infrastructure and other essential services in the area. Taken into account with the other proposed projects in the area, induced growth impacts could be significant. The EPA's recommendation is to make both the methodology and the assumptions in the growth inducement analysis as transparent as possible to the public and decision makers. To do this, the EPA recommends that Corps, and K. Hovnanian Homes do the following:

(1) Identify which land use model will be used, discuss its strengths and weaknesses, and describe why it was selected.

(2) Identify the assumptions used in the model and why those assumptions were selected. For example, describe which method will be used to allocate growth to analysis zones, its strengths and weaknesses, and why that method was selected.

(3) Ground truth the results of the land use model by enlisting local expertise involved in land use issues, such as local government officials, land use and transportation planners, home loan officers, and real estate representatives. Use their collective knowledge to validate or modify the results of the land use model.

(4) Use the results of the growth inducement analysis to inform transit options, neighborhood design, and recommendations for land use as well as mitigation measures to reduce environmental impacts.

**Smart Growth, Green Building, and Leadership in Energy and Environmental Design**

Environmental impacts of the proposed Project can be reduced through modifications to the Project footprint and configuration, and the integration of Smart Growth, Green Building, and Leadership in Energy and Environmental Design (LEED) principles. For your benefit, the EPA is enclosing information on these principles, including how they can reduce impacts to different resource areas.

**Project Purpose and Need**

The purpose and need statement in the Draft Environmental Impact Statement (DEIS) should be clearly stated and briefly describe the underlying purpose and need to which the U.S. Army Corps of Engineers (Corps) is responding in proposing alternatives, including the proposed action (40 C.F.R. 1502.13.) The statement of purpose and need should explain why K. Hovnanian Homes is undertaking the proposed Project, and the objectives that the action is intended to achieve. A clear purpose and need statement is important under the National Environmental Policy Act (NEPA) and to the EPA's review in that it should be directly linked to the proposed alternative designs and clarify the potential impacts of a range of reasonable alternatives for the proposed Project. The DEIS discussion of purpose and need should also include a detailed description of why a development the size, composition, and location of the proposed Project is needed.

**Alternatives**

The EIS should rigorously explore and objectively evaluate a reasonable range of alternatives (40 C.F. R. 1502.14). Because of the large footprint of the proposed Project and the potential for significant impacts to several environmental resources, the Corps and K. Hovnanian Homes should consider a range of alternatives that avoid impacts to these resources to the maximum extent practicable. According to the NOI, the DEIS is expected to include the No Action, Proposed Action, Conceptual-Level Strategy, Reduced Development Footprint, and Off-site Alternatives. The DEIS should clearly describe and comparatively assess these alternatives, and any other reasonable alternatives, for their direct, indirect, and cumulative effects to environmental resources. Where impacts are unavoidable, the DEIS should describe and commit to appropriate mitigation measures.

The EPA strongly encourages a comprehensive inventory and assessment of the environmental resources at the proposed Project site, and the preservation, in perpetuity, of areas with higher functions and values. The methods used for this analysis should be included as an appendix to the DEIS with results described within the DEIS, including how the alternatives have been developed to avoid and protect environmental resources identified at the site.

Thank you for the opportunity to review the NOI and provide comments to help with the development and preparation of the DEIS for the proposed Project. When the DEIS is released for review, please send two hard copies and one CD copy to the address above (mailcode: CED-2) at the same time five copies are formally filed with EPA Headquarters. If you have any questions, please contact Paul Amato, the lead reviewer for this project. Paul can be reached at (415) 972-3847 or amato.paul@epa.gov.

Sincerely,

Kathleen M. Goforth

Kathleen M. Goforth, Manager
Environmental Review Office

Enclosure:
EPA's Smart Growth Recommendations

Cc:
Mr. Kenneth Sanchez, Assistant Field Supervisor, U.S. Fish and Wildlife Service
Mr. Patrick Gillum, Central Valley Regional Water Quality Control Board
Ms. Sandy Morey, Regional Manager, California Department of Fish and Game
Mr. Paul Junker, Planning Director, City of Rancho Cordova

ENVIRONMENTAL PROTECTION AGENCY'S SMART GROWTH RECOMMENDATIONS FOR THE NOTICE OF INTENT TO PREPARE A DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE PRESERVE AT SUNRIDGE PROJECT, CITY OF RANCHO CORDOVA, SACRAMENTO COUNTY, CALIFORNIA, FEBRUARY 2, 2009

Smart Growth has been defined as "development that serves the economy, community, and the environment"[1]. It incorporates government and community partnering, environmental stewardship, and transportation network enhancements for safety and functionality.

***Consider implementing Smart Growth principles in development planning.***
National, state and local organizations have come together to form the Smart Growth Network (SGN), a voluntary initiative led by 36 partner organizations to encourage development that benefits the economy, communities, and ecological sustainability.
By incorporating smart growth principles, project proponents can demonstrate their commitment to being environmentally sound in development planning. Additionally, smart growth development can support economic growth and facilitate attainment of quality of life goals; attributes found attractive to both developers and potential home owners. Smart Growth design is beneficial for all stakeholders by providing opportunities to save money and resources. Furthermore, the 2004 National Community Preference Survey conducted by the National Association of Realtors concluded that Americans tend to favor Smart Growth communities because they offer shorter commute times and walkable communities. The SGN has made it feasible and efficient to become a partner within the network. For information regarding the SGN please visit the following website: http://www.smartgrowth.org/. For innovative solutions which address low impact development, please visit EPA's Smart Growth website at: http://www.epa.gov/smartgrowth/index.htm.

***Smart Growth is Smart Business***
Business leaders are beginning to realize that building better communities affects their bottom line. When implemented, Smart Growth strategies allow developers to profit financially while being environmentally sustainable. In the *Smart Growth is Smart Business* study, the National Association of Local Government Environmental Professionals (NALGEP) found that:

- Quality of Life is Crucial to Business;
- Reinvestment in Established Communities Makes Business Sense;
- Smart Growth Is an Emerging Market Opportunity;
- Leading Businesses Seek to Improve Growth Management in Their Regions; and
- Smart Growth Sells in Both Up and Down Economies.

Furthermore, a 2004 National Community Preference Survey conducted by the National Realtors Association revealed the following:

- Americans favor communities that have smart growth values which result in shorter commute times, sidewalks, and walkable areas;
- When Americans choose to purchase a home, commute time is an important deciding factor; and
- Americans expressed the desire for government and business to invest in already existing communities before new developments further away from cities and the suburbs. In

[1] Smart Growth Network, *Getting to Smart Growth: 100 Policies for Implementation,* http://smartgrowth.org

addition, Americans also expressed a desire for more housing for moderate to low income brackets, and more areas to walk and bike in their communities.

An EPA publication, *Parking Spaces / Community Places: Finding the Balance through Smart Growth Solutions* (http://www.epa.gov/smartgrowth/pdf/EPAParkingSpaces06.pdf) illustrates the opportunity to use parking policies to save money, improve the environment, and meet larger community goals by offering commuters a choice in transportation. These choices can lead to less vehicle miles traveled, a decrease in air pollutants, and a reduction in the amount of pavement and infrastructure costs. Smart Growth is beneficial to developers because it can lead to lower infrastructure costs

***Consider development plans that incorporate innovative design modifications.***
EPA recommends incorporating design modifications to address impacts that development projects have on the environment. For example, both coving and bay designed homes offer more space and cost less to build due to the need for fewer roads and utilities. Additionally, they offer safer travel and a greater variety than their counterparts, the traditional suburbs.

Coving is a development design that enables the planning of communities while taking green space created in front of houses and winding streets into design plans. This design innovation positions homes to form a curve that is separate from the pattern of the streets, allowing for more homes per given length of a road. This design benefits developers by reducing the lineal feet of paved road by twenty to forty percent.

Bay designed homes also require less infrastructure. Unlike coving, a bay home development and the surrounding land are commonly held by a home owners association. This design considers pedestrian walkability by connecting the fronts of units with a walkway. The homes are designed with the entrance and garage in the rear of the structure, while leaving the front as open space. While housing densities may be similar to traditional housing developments, the bay home concept cuts up to fifty percent in infrastructure spending and creates a pedestrian friendly neighborhood.

***Consider increasing density in development plans.***
Density is important due to several influential factors including its ability to support housing choice and affordability, help expand transportation choices, support community fiscal health, improve security, help protect the environment and cut infrastructure costs. When designing for density we recommend the following design principles:

- Identify appropriate locations;
- Connect people and places;
- Mix uses;
- Find parking alternatives; and,
- Create great places for people to live, work and play.

For more information concerning the abovementioned principles, we recommend the following publication: *Creating Great Neighborhoods: Density in Your Community* available online at: http://www.epa.gov/piedpage/pdf/density.pdf.

***Consider wildlife habitat while designing development plans.***
It has long been recognized that development is infringing upon national parks, forests and other critical wildlife habitat. Moreover, the amount of urban land has quadrupled in the past 50 years. As development spreads farther into natural areas, wildlife habitat becomes fragmented. Scientists and wildlife preservation organizations have identified sprawl as a key indicator of species loss.

Land preservation efforts should be especially targeted toward critical aquatic areas including groundwater recharge zones, wetlands, vernal pools, streams, and floodplains. These areas can be protected from development by aligning zoning, determining protected areas, and changing development guidelines to use land more efficiently.

The publication *Endangered by Sprawl: How Runaway Development Threatens America's Wildlife* (http://www.smartgrowthamerica.org/ebsreport/EndangeredBySprawl.pdf) recommends several measures to help avoid the loss of wildlife due to urban encroachment. It is recommended that you create a comprehensive infrastructure strategy that will take the following into consideration:

- Create and maintain inventories of both species and natural resources;
- Establish regional cooperation to protect natural areas and species;
- Develop green infrastructure protection plans that include performance goals and measurements;
- Establish urban growth boundaries or urban service boundaries;
- Protect critical natural habitats; and
- Build reliable local funding resources for green infrastructure and species protection.

***Design to Minimize Air Emissions***
Air quality is greatly affected by sprawling development patterns that increase vehicle travel and associated air pollution. To help developers mitigate air quality impacts associated with developments EPA published guidance pertaining to air quality and land use activities. This guidance was developed to encourage stakeholders and developers to use better land use planning strategies which result in improvements in air quality. This guidance covers a variety of issues such as air quality planning, transportation planning, land use planning, land use activities and accounting for land use in the air quality and transportation processes. See *EPA Guidance: Improving Air Quality through Land Use Activities* (http://www.epa.gov/otaq/stateresources/policy/transp/landuse/r01001.pdf).

***Consider the Use of Native Vegetation***
To help protect the natural environment and its valuable water resources, EPA recommends that developers take future water use into consideration. EPA recommends landscaping with native plants when feasible. Using native plants that are adapted to the environment is an important consideration when developing in arid areas with limited water resources.

Vegetation planning is an important aspect of development. For example, trees can help block the summer sun. They also help by acting as wind breaks during extreme weather, control humidity and can help with home appreciation. We encourage the use of native plants and trees

in development planning. This can help reduce water consumption and maintenance costs, which are attractive attributes for home owners. The California Native Plant Society provides information regarding native plant species on its Web page: http://www.cnps.org/

***Green Building***

As stated at EPA's Green Building website, "green building is the practice of creating structures and using processes that are environmentally responsible and resource-efficient throughout a building's life-cycle from siting to design, construction, operation, maintenance, renovation and deconstruction." The website goes on to state that "well-designed, constructed, operated and maintained green buildings can have many benefits, including durability; reduced costs for energy, water, operations and maintenance; improved occupant health and productivity; and the potential for greater occupant satisfaction than standard developments. A green building may cost more up front, but can save money over the life of the building through lower operating costs." These upfront costs may be only a few percentage points higher than conventional building standards.[2] For more information on Green Building, visit EPA's Green Building website at: www.epa.gov/greenbuilding/index.htm. The EIS should discuss the environmental and economic benefits of green building relevant to the Project alternatives.

***Pursue Leadership in Energy and Environmental Design (LEED) Certification***

LEED is a Green Building rating system that encourages the adoption of sustainable building practices through the use of universally accepted tools and performance criteria. The U.S. Green Building Council has established LEED rating systems for various types of development including commercial, retail, homes and neighborhood development. EPA encourages the pursuit of LEED certification for the proposed Project. More information on LEED certification can be found at the U.S. Green Building Council website at http://www.usgbc.org.

[2] According to the frequently asked questions on green building, at EPA's website http://www.epa.gov/greenbuilding/pubs/faqs.htm#13